

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

Estate of VALERIE YOUNG, et al.,

Case No.: 07cv06241 (LAK)

plaintiffs,

**PLAINTIFFS' FIRST SET
OF INTERROGATORIES**

- against -

STATE OF NEW YORK OFFICE OF MENTAL RE-
TARDATION AND DEVELOPMENTAL
DISABILITIES, *et al.*,

defendants.

PLEASE TAKE NOTICE that pursuant to Rules 26(a)(1) and 33 of the Federal Rules of Civil Procedure and Local Civil Rules 26.2, 26.3, 33.1 and 33.3, Estate of VALERIE YOUNG by VIOLA YOUNG, as Administrator of the Estate of Valerie Young, and in her personal capacity, SIDNEY YOUNG, and LORETTA YOUNG LEE, by their attorneys, the Catafago Law Firm, PC and Jonathan Bauer, Esq., hereby requests that defendants answer the following Interrogatories, within thirty days after the date of service of these Interrogatories.

PLEASE TAKE FURTHER NOTICE THAT pursuant to Fed. R. Civ. P. 26(e)(1), you are under a duty to supplement your answers if you discover that in some material respect the information disclosed herein is incomplete or incorrect and if the additional or corrective information has not otherwise been made known to plaintiff during the discovery process or in writing. Further, pursuant to Rule 26(e)(2), defendants are also under a duty to seasonably amend answers to these interrogatories if defendants learn that any response given is in some material respect incomplete or incorrect and if the additional or corrective information has not otherwise been made known to the plaintiff during the discovery process or in writing.

INSTRUCTIONS AND DEFINITIONS

- (A) "Defendant" or "Defendants" means the defendants in this action or any one of them, their agents, agencies, servants, officers and/or employees.
- (B) "You" or "Yours" means the defendants in this action or any one of them, their agents, agencies, servants, officers and/or employees.
- (C) "Young" or "Valerie" means the plaintiffs' decedent, Valerie Young.
- (D) The definitions, requirements and rules of construction of Southern District Local Civil Rules 26.2 (Assertion of Privilege), 26.3 (Uniform Definitions in Discovery Requests), 26.3, 33.1 (Answering Interrogatory By Reference to Records) and 33.3 (Interrogatories in the Southern District) are hereby incorporated herein.

INTERROGATORIES

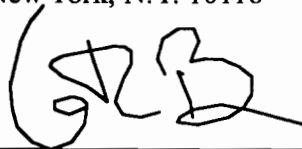
- 1 Identify the person or persons answering these interrogatories.
- 2 Identify all health care providers who treated, cared for, provided consultation, reviewed treatment, reviewed treatment or medical records, and/or evaluated Valerie Young from January 1, 2000 up to and including June 19, 2005, including by example but not limitation, physicians, physical therapists, nurses, clinics, hospitals, and/or dentists.
- 3 Identify all documents comprising, relating and/or concerning incidents, incident reports and investigations, including but not limited to Minor Incidents, Major Incidents, Non-serious Incidents, Serious Incidents, and Reportable Incidents of, involving, concerning or relating to Valerie Young, including, but not limited to the all documents of or concerning the investigation of the New York State Commission on Quality of Care report of its investigation into the death of Valerie Young from January 1, 2000 up to and including the date that these Interrogatories are answered.
- 4 Identify the person(s) or entity who have physical custody of the documents identified in your answer to Interrogatory 3.
- 5 Identify all persons with knowledge or information relevant to the subject matter of this action, including, but not limited to, all persons who witnessed or have knowledge of any fact, report or statement concerning or relevant to the matters set forth in the complaint.
- 6 Identify all persons who have acted on defendants' behalf who have investigated the matters set forth in the complaint.
- 7 Identify all of defendants' employees, agents, officials, or representatives or any persons purporting to act on behalf of the defendants who have made any oral or written statement or report to anyone, regarding the matters set forth in the complaint.
- 8 Identify all persons who have written any report or made and/or signed any statement concerning any of the matters alleged in the complaint, not otherwise disclosed herein.

- 9 Identify all persons with possession, custody or control of any report or statement made by a person identified in response to Interrogatory Nos. 7 and 8.
- 10 Identify all persons whom you intend to call as expert witnesses and/or to provide opinion testimony irrespective of whether those persons are specially retained to testify in this action, including any employee of any defendant who may provide opinion testimony or otherwise render an opinion concerning the care, medical care and/or treatment of Valerie Young.
- 11 Identify any other individual not listed above with knowledge of plaintiff's death and the care and treatment provided to her for the five years preceding her death.
- 12 Identify all documents concerning matters stated in the complaint not otherwise identified herein, and for each document identify the custodian and location of the document. The documents identified should include, but not be limited to:
 - (a) all documents received or obtained from any person concerning any of the matters alleged in the complaint;
 - (b) all reports, records, invoices, prescriptions, x-rays, diagrams, charts or other written records that memorialize any medical treatment, examination or medical consultation of plaintiff from January 1, 2000 through June 19, 2005.
 - (c) all documents comprising, memorializing, documenting or otherwise referring to conversations or any other communication with the plaintiffs or plaintiffs' decedent;
 - (d) all documents concerning plaintiffs' decedent's state of health on or after January 1, 2000.
 - (e) all documents received by any defendant concerning the matters alleged in the complaint;

- (f) all reports, drafts of reports, memoranda, email or any other documents, including invoices, written or supplied by or to the persons identified in your answer to Interrogatory No. 10.

Dated: New York, New York
November 8, 2007

Catafago Law Firm, P.C. &
Jonathan Bauer
Attorneys for Plaintiff
Empire State Building
350 Fifth Ave. Suite 4810
New York, N.Y. 10118



Jonathan Bauer

Certificate of Service

I hereby certify that the foregoing Plaintiff's First Interrogatories was served upon the following by first class United States Postal Service Mail on November 8, 2007:

State of New York
Office of the Attorney General
Attorneys for Defendants
Jose Velez, Esq. Assistant Attorney General
120 Broadway
New York, N.Y. 10271-0332



IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

Estate of VALERIE YOUNG, et al.,

Case No.: 07cv06241 (LAK)

plaintiffs,

- against -

STATE OF NEW YORK OFFICE OF MENTAL RETAR-
DATION AND DEVELOPMENTAL DISABILITIES, et al.,

defendants.

**PLAINTIFFS' FIRST RE-
QUEST FOR PRODUCTION
OF DOCUMENTS, ELEC-
TRONICALLY STORED
INFORMATION AND TAN-
GIBLE THINGS**

PLEASE TAKE NOTICE that pursuant to Rules 26(a)(1) and 34 of the Federal Rules of Civil Procedure and Local Civil Rules 26.2 and 26.3 of the United States District Court for the Southern District of New York, Estate of VALERIE YOUNG by VIOLA YOUNG, as Administrator of the Estate of Valerie Young, and in her personal capacity, SIDNEY YOUNG, and LORETTA YOUNG LEE, by their attorneys, the Catafago Law Firm, PC and Jonathan Bauer, Esq., hereby requests that defendants respond to the following requests for documents, separately and fully in writing, within thirty days after the date of service of this Notice.

PLEASE TAKE FURTHER NOTICE THAT pursuant to Fed. R. Civ. P. 26(e)(1), you are under a duty to supplement your disclosures if you discover that in some material respect the information disclosed herein is incomplete or incorrect and if the additional or corrective information has not otherwise been made known to plaintiff during the discovery process or in writing. Further, pursuant to Rule 26(e)(2), defendants are also under a duty to seasonably amend responses to these production requests if defendants learn that any response given is in some material respect incomplete or incorrect and if the additional or corrective information has not otherwise been made known to the plaintiff during the discovery process or in writing.

INSTRUCTIONS AND DEFINITIONS

- (A) "Defendant" or "Defendants" means the defendants in this action or any one of them, their agents, agencies, servants, officers and/or employees.
- (B) "You" or "Yours" means the defendants in this action or any one of them, their agents, agencies, servants, officers and/or employees.
- (C) "Young" or "Valerie" means the plaintiffs' decedent, Valerie Young.
- (D) The definitions, requirements and rules of construction of Fed.R.Civ.P. Rule 34 and Southern District Local Civil Rules 26.3 (Assertion of the Claim of Privilege) and 26.3 (Uniform Definitions in Discovery Requests) are hereby incorporated herein.

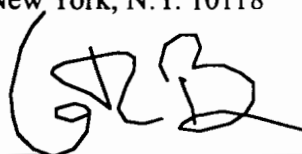
REQUESTS FOR PRODUCTION

- (1) All documents described in defendants' October 9, 2007 Initial Disclosure pursuant to Fed.R.Civ.P. Rule 26(a)(1).
- (2) All documents comprising, relating and/or concerning incidents, incident reports and investigations, including but not limited to Minor Incidents, Major Incidents, Non-serious Incidents, Serious Incidents, and Reportable Incidents of, involving, concerning or relating to Valerie Young, including, but not limited to the all documents of or concerning the investigation of the New York State Commission on Quality of Care report of its investigation into the death of Valerie Young from January 1, 2000 up to and including the date that you respond to this Request for Production.
- (3) All documents of or concerning the care and treatment of Valerie Young, including by example and not by limitation, medical records, nursing records, clinic records, Treatment Team Progress Notes, and Individualized Placement Plan ("IPP") annual and quarterly review documents, from January 1, 2000 up to and including the date that you respond to this Request for Production.
- (4) All documents concerning Valerie Young's state of health from January 1, 2000 up to and including June 19, 2005, not otherwise produced.
- (5) All reports, drafts of reports, memoranda, email, notes, and invoices prepared by any and all persons that you identify in your answer to Interrogatory No. 10.
- (6) The resume and/or curriculum vitae of any and all individuals that you identify in your answer to Interrogatory No. 10.

- (7) All internal memoranda, email or any other communication between the any of the defendants and each other or any other person or entity concerning Valerie Young from January 1, 2000 up to and including the date that you respond to this Request for Production.

Dated: New York, New York
November 8, 2007

Catafago Law Firm, P.C. &
Jonathan Bauer
Attorneys for Plaintiff
Empire State Building
350 Fifth Ave. Suite 4810
New York, N.Y. 10118



Jonathan Bauer

Certificate of Service

I hereby certify that the foregoing Plaintiff's First Request for Production of Documents, Electronically Stored Information and Tangible Things was served upon the following by first class United States Postal Service Mail on November 8, 2007:

State of New York
Office of the Attorney General
Attorneys for Defendants
Jose Velez, Esq. Assistant Attorney General
120 Broadway
New York, N.Y. 10271-0332

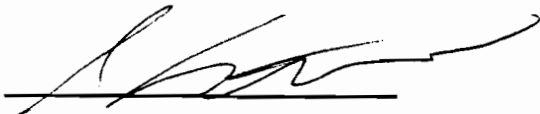


EXHIBIT B



STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL

ANDREW M. CUOMO
Attorney General

LESLIE G. LEACH
Executive Deputy Attorney General
Division of State Counsel

JUNE DUFFY
Assistant Attorney General in Charge
Litigation Bureau

(212) 416-8164

November 30, 2007

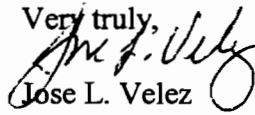
Jacques Catafago, Esq.
Catafago Law Firm, P.C.
Empire State Building
350 Fifth Avenue, Suite 4810
New York, NY 10118

Re: Estate of Valerie Young, et al. v. Young Lee, et al.; 07-cv-06241 (LAK)(DCF)

Dear Mr. Catafago:

I am an Assistant Attorney General in the Office of Andrew M. Cuomo, Attorney General of the State of New York, counsel for defendants State of New York Office of Mental Retardation and Developmental Disabilities, Brooklyn Developmental Disabilities Service Office Director Peter Uschakow, Deputy Director Operations Jan Williamson, Residential Unit Supervisor Gloria Hayes, Treatment Team Leader Kathleen Ferdinand and Medical Doctor Jovan Milos, and Hudson Valley Developmental Disabilities Services Office Deputy Director Operations Suresh Arya. Enclosed is a copy of Defendants' Responses to Plaintiffs' First Set of Interrogatories and Defendants' Responses to Plaintiffs' First Request for the Production of Documents, Electronically Stored Information and Tangible Things. Please note that, the documents will be produced upon receipt of the authorizations for the release and disclosure of health information and psychotherapy notes for the decedent Valerie Young which were mailed to the attention of plaintiff's counsel on November 8, 2007.

Do not hesitate to contact me should you have any questions regarding this matter.

Very truly,

Jose L. Velez
Assistant Attorney General

Encl.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

Estate of VALERIE YOUNG, et al.,	:	07-CV-6241 (LAK)(DCF)
	:	
Plaintiffs,	:	DEFENDANTS'
	:	RESPONSES TO
- against -	:	PLAINTIFFS' FIRST
	:	REQUEST FOR
STATE OF NEW YORK OFFICE OF MENTAL	:	PRODUCTION OF
RETARDATION AND DEVELOPMENTAL	:	DOCUMENTS,
DISABILITIES, et al.,	:	ELECTRONICALLY
	:	STORED INFORMATION
Defendants.	:	AND TANGIBLE THINGS

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Defendants State of New York Office of Mental Retardation and Developmental Disabilities ("OMRDD"), Brooklyn Developmental Disabilities Service Office Director Peter Uschakow, Deputy Director Operations Jan Williamson, Residential Unit Supervisor Gloria Hayes, Treatment Team Leader Kathleen Ferdinand and Medical Doctor Jovan Milos, and Hudson Valley Developmental Disabilities Services Office Deputy Director Operations Suresh Arya, in their official capacities and individually (hereinafter collectively referred to as "defendants"), by their attorney, ANDREW M. CUOMO, Attorney General of the State of New York, hereby respond to Plaintiff's First Request For Production of Documents, Electronically Stored Information and Tangible Things as follows:

RESERVATION OF RIGHTS

Defendants hereby reserve all objections as to the admissibility of the following documents into evidence at the trial of this action, or in any other proceeding on any and all grounds, including but not limited to competency, relevancy, materiality, and privilege.

In the event that defendants ascertain new information that is responsive to these

document requests, defendants hereby reserve the right to supplement, clarify, revise or correct their responses to plaintiff's document requests.

Defendants object to the definitions set forth in plaintiff's document requests to the extent they are inconsistent with applicable law and the Federal Rules of Civil Procedure.

Defendants reserve the right to supplement or amend these responses and objections at any time prior to the trial of this action.

Without waiving the foregoing objections, defendants respond as follows:

REQUESTS FOR PRODUCTION

REQUEST NO. 1: "All documents described in defendants' October 9, 2007 Initial Disclosure pursuant to Fed. R.Civ.P. Rule 26(a)(1)."

RESPONSE NO. 1: Defendants object to this document request as vague, overbroad and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving these objections, copies of all records that are responsive to this request deemed to be within the possession, custody or control of New York State or the New York State Office of Mental Retardation and Developmental Services and/or the Brooklyn Developmental Disabilities Service Office are annexed herein under Exhibit Tab A.¹

REQUEST NO. 2: "All documents comprising, relating and/or concerning incidents, incident reports and investigations, including but not limited to Minor Incidents, Major Incidents, Non-serious Incidents, Serious Incidents, and Reportable Incidents of, involving, concerning or relating to Valerie Young, including, but not limited to the all documents of or concerning the investigation

¹ The documents will be produced upon receipt of the authorizations for the release and disclosure of health information and psychotherapy notes for the decedent Valerie Young which were mailed to the attention of plaintiff's counsel on November 8, 2007.

of the New York State Commission on Quality of Care report of its investigation into the death of Valerie Young from January 1, 2000 up to and including the date that you respond to this Request for Production.”

RESPONSE NO. 2: See response to Request No. 1.

REQUEST NO. 3: “All documents of or concerning the care and treatment of Valerie Young, including by example and not by limitation, medical records, nursing records, clinic records, Treatment Team Progress Notes, and Individualized Placement Plan (“IPP”) annual and quarterly review documents, from January 1, 2000 up to and including the date that you respond to this Request for Production.”

RESPONSE NO. 3: See response to Request No. 1.

REQUEST NO. 4: “All documents concerning Valerie Young’s state of health from January 1, 2000 up to and including June 19, 2005, not otherwise produced.”

RESPONSE NO. 4: See response to Request No. 1.

REQUEST NO. 5: “All reports, drafts of reports, memoranda, email, notes, and invoices prepared by any and all persons that you identify in your answer to Interrogatory No. 10.”

RESPONSE NO. 5: Defendants object to this document request as vague, overbroad and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving these objections, such documents do not exist.

REQUEST NO. 6: “The resume and/or curriculum vitae of any and all individuals that you identify in your answer to Interrogatory No. 10.”

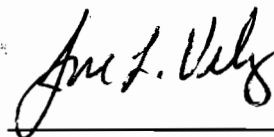
RESPONSE NO. 6: See response to Request No. 5.

REQUEST NO. 7: "All internal memoranda, email or any other communication between the any of the defendants and each other or any other person or entity concerning Valerie Young from January 1, 2000 up to and including the date that you respond to this Request for Production."

RESPONSE NO. 7: See response to Request No. 1.

Dated: New York, New York
November 30, 2007

ANDREW M. CUOMO,
Attorney General of the
State of New York
Attorney for Defendants
By:

A handwritten signature in black ink, appearing to read "Jose L. Velez", written over a horizontal line.

JOSE L. VELEZ
Assistant Attorney General
120 Broadway - 24th Floor
New York, New York 10271
Tel. No. (212) 416-8164

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
Estate of VALERIE YOUNG by VIOLA YOUNG, :
as Administratrix of the Estate of Valerie Young, :
and in her personal capacity, et al., : **CERTIFICATE OF SERVICE**

Plaintiff, : 07-CV-6241 (LAK)(DCF)

-against- :

STATE OF NEW YORK OFFICE OF MENTAL :
RETARDATION AND DEVELOPMENTAL :
DISABILITIES, et al., :

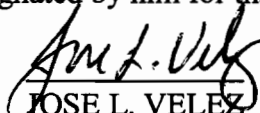
Defendants. :
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JOSE L. VELEZ, certifies that:

He is an Assistant Attorney General in the office of ANDREW M. CUOMO, the Attorney General of the State of New York, attorney for the defendants. On November 30, 2007, he served the annexed defendants' responses to plaintiffs' first request for production of documents, electronically stored information and tangible things upon the following named person:

Jacques Catafago, Esq.
Catafago Law Firm, P.C.
Empire State Building
350 Fifth Avenue, Suite 4810
New York, NY 10118

attorney of plaintiffs in the within entitled action by electronic case filing and by depositing a true and correct copy thereof, properly enclosed in a post-paid wrapper, in a post office box regularly maintained by the United States Postal Service at 120 Broadway, New York, New York 10271, directed to said person at the address within the State designated by him for that purpose.


JOSE L. VELEZ

Executed on November 30, 2007

EXHIBIT C

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

Estate of VALERIE YOUNG by VIOLA YOUNG, as
Administrator of the Estate of Valerie Young, and in
her personal capacity, SIDNEY YOUNG, and
LORETTA YOUNG LEE,

plaintiffs,

- against -

ECF CASE

Case No.: 07 CV 06241 (LAK)

**NOTICE TO TAKE THE
DEPOSITION OF DEFENDANT
JAN WILLIAMSON**

STATE OF NEW YORK OFFICE OF MENTAL
RETARDATION AND DEVELOPMENTAL
DISABILITIES, PETER USCHAKOW, personally
and in his official capacity, JAN WILLIAMSON,
personally and in her official capacity, SURESH
ARYA, personally and in his official capacity;
KATHLEEN FERDINAND, personally and her in
official capacity, GLORIA HAYES, personally and in
her official capacity, DR. MILOS, personally and in
his official capacity,

defendants

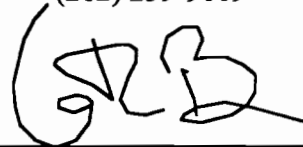
You are hereby notified that pursuant to Rules 26, 30 and 34 of the Federal Rules of Civil
Procedure, plaintiffs will take the oral deposition of defendant JAN WILLIAMSON at the
CATAFAGO LAW FIRM, PC, Empire State Building, 350 Fifth Avenue Suite 4810, New York,
N.Y. 10118 on December 17, 2007 at 10:00 a.m. before an officer authorized by law to
administer oaths who will record the proceedings by stenographic means.

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The deponent and/or the deponent's attorney shall produce at or before the scheduled deposition all documents previously demanded in Plaintiff's First Request for Production of Documents, Electronically Stored Information and Tangible Things, which request is incorporated herein, and/or identified in Defendants' October 9, 2007 Initial Production not yet produced.

Dated: New York, New York
November 13, 2007

Catafago Law Firm, P.C. &
Jonathan Bauer
Attorneys for Plaintiff
Empire State Building
350 Fifth Ave. Suite 4810
New York, N.Y. 10118
(212) 239-9669

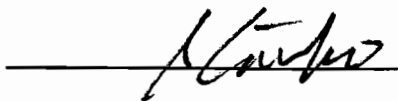


Jonathan Bauer

Certificate of Service

I hereby certify that the foregoing Notice to take the Deposition of Jan Williamson was served upon the following by first class U.S. Postal Service mail on November 13, 2007:

State of New York
Office of the Attorney General
Attorneys for Defendants
Jose Velez, Esq. Assistant Attorney General
120 Broadway
New York, N.Y. 10271-0332



IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

Estate of VALERIE YOUNG by VIOLA YOUNG, as
Administrator of the Estate of Valerie Young, and in
her personal capacity, SIDNEY YOUNG, and
LORETTA YOUNG LEE,

plaintiffs,

- against -

STATE OF NEW YORK OFFICE OF MENTAL
RETARDATION AND DEVELOPMENTAL
DISABILITIES, PETER USCHAKOW, personally
and in his official capacity, JAN WILLIAMSON,
personally and in her official capacity, SURESH
ARYA, personally and in his official capacity;
KATHLEEN FERDINAND, personally and her in
official capacity, GLORIA HAYES, personally and in
her official capacity, DR. MILOS, personally and in
his official capacity,

defendants

ECF CASE

Case No.: 07 CV 06241 (LAK)

**NOTICE TO TAKE THE
DEPOSITION OF DEFENDANT
OFFICE OF MENTAL
RETARDATION AND
DEVELOPMENTAL DISABILITIES**

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You are hereby notified that pursuant to Rules 26, 30 and 34 of the Federal Rules of Civil Procedure, plaintiffs will take the oral deposition of defendant STATE OF NEW YORK OFFICE OF MENTAL RETARDATION AND DEVELOPMENTAL DISABILITIES (hereafter, "OMRDD") at the CATAFAGO LAW FIRM, PC, Empire State Building, 350 Fifth Avenue Suite 4810, New York, N.Y. 10118 on December 27, 2007 at 10:00 a.m. before an officer authorized by law to administer oaths who will record the proceedings by stenographic means.

The person or persons designated by defendant to testify, must be familiar with and prepared to testify concerning all matters relevant to the Complaint and Answer, including, by example only and not by limitation:

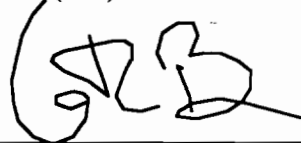
- (A) The allegations of the Complaint;
- (B) The allegations of the Answer, including the Affirmative Defenses;
- (C) OMRDD policies concerning the provision of medical care and treatment to residents at the Brooklyn Developmental Center (hereafter, "BDC"), including Valerie Young;
- (D) Supervision over the provision of medical care and treatment at BDC to residents at BDC, including Valerie Young;
- (E) OMRDD investigatory policies, procedures and practices in the event of the death of a BDC resident, including Valerie Young;
- (F) Investigation of the death of Valerie Young;

///

The deponent and/or the deponent's attorney shall produce at or before the scheduled deposition all documents previously demanded in Plaintiff's First Request for Production of Documents, Electronically Stored Information and Tangible Things, which request is incorporated herein, and/or identified in Defendants' October 9, 2007 Initial Production not yet produced.

Dated: New York, New York
November 13, 2007

Catafago Law Firm, P.C. &
Jonathan Bauer
Attorneys for Plaintiff
Empire State Building
350 Fifth Ave. Suite 4810
New York, N.Y. 10118
(212) 239-9669



Jonathan Bauer

Certificate of Service

I hereby certify that the foregoing Notice to take the Deposition of OMRDD was served upon the following by first class U.S. Postal Service mail on November 13, 2007:

State of New York
Office of the Attorney General
Attorneys for Defendants
Jose Velez, Esq. Assistant Attorney General
120 Broadway
New York, N.Y. 10271-0332



IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

Estate of VALERIE YOUNG by VIOLA YOUNG, as
Administrator of the Estate of Valerie Young, and in
her personal capacity, SIDNEY YOUNG, and
LORETTA YOUNG LEE,

plaintiffs,

- against -

STATE OF NEW YORK OFFICE OF MENTAL
RETARDATION AND DEVELOPMENTAL
DISABILITIES, PETER USCHAKOW, personally
and in his official capacity, JAN WILLIAMSON,
personally and in her official capacity, SURESH
ARYA, personally and in his official capacity;
KATHLEEN FERDINAND, personally and her in
official capacity, GLORIA HAYES, personally and in
her official capacity, DR. MILOS, personally and in
his official capacity,

defendants

ECF CASE

Case No.: 07 CV 06241 (LAK)

**NOTICE TO TAKE THE
DEPOSITION OF DEFENDANT
DR. MILOS**

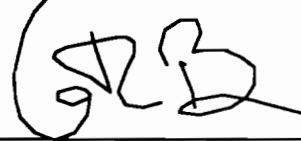
You are hereby notified that pursuant to Rules 26, 30 and 34 of the Federal Rules of Civil
Procedure, plaintiffs will take the oral deposition of defendant DR. MILOS at the CATAFAGO
LAW FIRM, PC, Empire State Building, 350 Fifth Avenue Suite 4810, New York, N.Y. 10118 on
December 21, 2007 at 10:00 a.m. before an officer authorized by law to administer oaths who
will record the proceedings by stenographic means.

///

The deponent and/or the deponent's attorney shall produce at or before the scheduled deposition all documents previously demanded in Plaintiff's First Request for Production of Documents, Electronically Stored Information and Tangible Things, which request is incorporated herein, and/or identified in Defendants' October 9, 2007 Initial Production not yet produced.

Dated: New York, New York
November 13, 2007

Catafago Law Firm, P.C. &
Jonathan Bauer
Attorneys for Plaintiff
Empire State Building
350 Fifth Ave. Suite 4810
New York, N.Y. 10118
(212) 239-9669



Jonathan Bauer

Certificate of Service

I hereby certify that the foregoing Notice to take the Deposition of Dr. Milos was served upon the following by first class U.S. Postal Service mail on November 13, 2007:

State of New York
Office of the Attorney General
Attorneys for Defendants
Jose Velez, Esq. Assistant Attorney General
120 Broadway
New York, N.Y. 10271-0332



IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

Estate of VALERIE YOUNG by VIOLA YOUNG, as
Administrator of the Estate of Valerie Young, and in
her personal capacity, SIDNEY YOUNG, and
LORETTA YOUNG LEE,

plaintiffs,

- against -

STATE OF NEW YORK OFFICE OF MENTAL
RETARDATION AND DEVELOPMENTAL
DISABILITIES, PETER USCHAKOW, personally
and in his official capacity, JAN WILLIAMSON,
personally and in her official capacity, SURESH
ARYA, personally and in his official capacity;
KATHLEEN FERDINAND, personally and her in
official capacity, GLORIA HAYES, personally and in
her official capacity, DR. MILOS, personally and in
his official capacity,

defendants

ECF CASE

Case No.: 07 CV 06241 (LAK)

**NOTICE TO TAKE THE
DEPOSITION OF DEFENDANT
GLORIA HAYES**

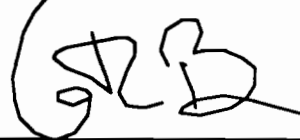
You are hereby notified that pursuant to Rules 26, 30 and 34 of the Federal Rules of Civil
Procedure, plaintiffs will take the oral deposition of defendant GLORIA HAYES at the
CATAFAGO LAW FIRM, PC, Empire State Building, 350 Fifth Avenue Suite 4810, New York,
N.Y. 10118 on December 20, 2007 at 10:00 a.m. before an officer authorized by law to
administer oaths who will record the proceedings by stenographic means.

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The deponent and/or the deponent's attorney shall produce at or before the scheduled deposition all documents previously demanded in Plaintiff's First Request for Production of Documents, Electronically Stored Information and Tangible Things, which request is incorporated herein, and/or identified in Defendants' October 9, 2007 Initial Production not yet produced.

Dated: New York, New York
November 13, 2007

Catafago Law Firm, P.C. &
Jonathan Bauer
Attorneys for Plaintiff
Empire State Building
350 Fifth Ave. Suite 4810
New York, N.Y. 10118
(212) 239-9669



Jonathan Bauer

Certificate of Service

I hereby certify that the foregoing Notice to take the Deposition of Gloria Hayes was served upon the following by first class U.S. Postal Service mail on November 13, 2007:

State of New York
Office of the Attorney General
Attorneys for Defendants
Jose Velez, Esq. Assistant Attorney General
120 Broadway
New York, N.Y. 10271-0332



IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

Estate of VALERIE YOUNG by VIOLA YOUNG, as
Administrator of the Estate of Valerie Young, and in
her personal capacity, SIDNEY YOUNG, and
LORETTA YOUNG LEE,

plaintiffs,

- against -

STATE OF NEW YORK OFFICE OF MENTAL
RETARDATION AND DEVELOPMENTAL
DISABILITIES, PETER USCHAKOW, personally
and in his official capacity, JAN WILLIAMSON,
personally and in her official capacity, SURESH
ARYA, personally and in his official capacity;
KATHLEEN FERDINAND, personally and her in
official capacity, GLORIA HAYES, personally and in
her official capacity, DR. MILOS, personally and in
his official capacity,

defendants

ECF CASE

Case No.: 07 CV 06241 (LAK)

**NOTICE TO TAKE THE
DEPOSITION OF DEFENDANT
KATHLEEN FERDINAND**

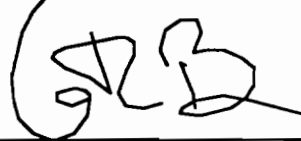
You are hereby notified that pursuant to Rules 26, 30 and 34 of the Federal Rules of Civil
Procedure, plaintiffs will take the oral deposition of defendant KATHLEEN FERDINAND at the
CATAFAGO LAW FIRM, PC, Empire State Building, 350 Fifth Avenue Suite 4810, New York,
N.Y. 10118 on December 19, 2007 at 10:00 a.m. before an officer authorized by law to
administer oaths who will record the proceedings by stenographic means.

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The deponent and/or the deponent's attorney shall produce at or before the scheduled deposition all documents previously demanded in Plaintiff's First Request for Production of Documents, Electronically Stored Information and Tangible Things, which request is incorporated herein, and/or identified in Defendants' October 9, 2007 Initial Production not yet produced.

Dated: New York, New York
November 13, 2007

Catafago Law Firm, P.C. &
Jonathan Bauer
Attorneys for Plaintiff
Empire State Building
350 Fifth Ave. Suite 4810
New York, N.Y. 10118
(212) 239-9669



Jonathan Bauer

Certificate of Service

I hereby certify that the foregoing Notice to take the Deposition of Kathleen Ferdinand was served upon the following by first class U.S. Postal Service mail on November 13, 2007:

State of New York
Office of the Attorney General
Attorneys for Defendants
Jose Velez, Esq. Assistant Attorney General
120 Broadway
New York, N.Y. 10271-0332



IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

Estate of VALERIE YOUNG by VIOLA YOUNG, as
Administrator of the Estate of Valerie Young, and in
her personal capacity, SIDNEY YOUNG, and
LORETTA YOUNG LEE,

plaintiffs,

- against -

STATE OF NEW YORK OFFICE OF MENTAL
RETARDATION AND DEVELOPMENTAL
DISABILITIES, PETER USCHAKOW, personally
and in his official capacity, JAN WILLIAMSON,
personally and in her official capacity, SURESH
ARYA, personally and in his official capacity;
KATHLEEN FERDINAND, personally and her in
official capacity, GLORIA HAYES, personally and in
her official capacity, DR. MILOS, personally and in
his official capacity,

defendants

ECF CASE

Case No.: 07 CV 06241 (LAK)

**NOTICE TO TAKE THE
DEPOSITION OF DEFENDANT
SURESH ARYA**

You are hereby notified that pursuant to Rules 26, 30 and 34 of the Federal Rules of Civil

Procedure, plaintiffs will take the oral deposition of defendant SURESH ARYA at the

CATAFAGO LAW FIRM, PC, Empire State Building, 350 Fifth Avenue Suite 4810, New York,

N.Y. 10118 on December 14, 2007 at 10:00 a.m. before an officer authorized by law to

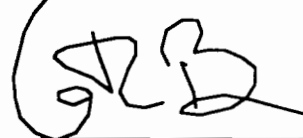
administer oaths who will record the proceedings by stenographic means.

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The deponent and/or the deponent's attorney shall produce at or before the scheduled deposition all documents previously demanded in Plaintiff's First Request for Production of Documents, Electronically Stored Information and Tangible Things, which request is incorporated herein, and/or identified in Defendants' October 9, 2007 Initial Production not yet produced.

Dated: New York, New York
November 13, 2007

Catafago Law Firm, P.C. &
Jonathan Bauer
Attorneys for Plaintiff
Empire State Building
350 Fifth Ave. Suite 4810
New York, N.Y. 10118
(212) 239-9669



Jonathan Bauer

Certificate of Service

I hereby certify that the foregoing Notice to take the Deposition of Suresh Arya was served upon the following by first class U.S. Postal Service mail on November 13, 2007:

State of New York
Office of the Attorney General
Attorneys for Defendants
Jose Velez, Esq. Assistant Attorney General
120 Broadway
New York, N.Y. 10271-0332



IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

Estate of VALERIE YOUNG by VIOLA YOUNG, as
Administrator of the Estate of Valerie Young, and in
her personal capacity, SIDNEY YOUNG, and
LORETTA YOUNG LEE,

plaintiffs,

- against -

STATE OF NEW YORK OFFICE OF MENTAL
RETARDATION AND DEVELOPMENTAL
DISABILITIES, PETER USCHAKOW, personally
and in his official capacity, JAN WILLIAMSON,
personally and in her official capacity, SURESH
ARYA, personally and in his official capacity;
KATHLEEN FERDINAND, personally and her in
official capacity, GLORIA HAYES, personally and in
her official capacity, DR. MILOS, personally and in
his official capacity,

defendants

ECF CASE

Case No.: 07 CV 06241 (LAK)

**NOTICE TO TAKE THE
DEPOSITION OF DEFENDANT
PETER USCHAKOW**

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You are hereby notified that pursuant to Rules 26, 30 and 34 of the Federal Rules of Civil

Procedure, plaintiffs will take the oral deposition of defendant PETER USCHAKOW at the

CATAFAGO LAW FIRM, PC, Empire State Building, 350 Fifth Avenue Suite 4810, New York,

N.Y. 10118 on December 12, 2007 at 10:00 a.m. before an officer authorized by law to

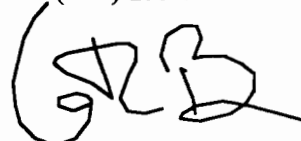
administer oaths who will record the proceedings by stenographic means.

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The deponent and/or the deponent's attorney shall produce at or before the scheduled deposition all documents previously demanded in Plaintiff's First Request for Production of Documents, Electronically Stored Information and Tangible Things, which request is incorporated herein, and/or identified in Defendants' October 9, 2007 Initial Production not yet produced.

Dated: New York, New York
November 13, 2007

Catafago Law Firm, P.C. &
Jonathan Bauer
Attorneys for Plaintiff
Empire State Building
350 Fifth Ave. Suite 4810
New York, N.Y. 10118
(212) 239-9669



Jonathan Bauer

Certificate of Service

I hereby certify that the foregoing Notice to take the Deposition of Peter Uschakow was served upon the following by first class U.S. Postal Service mail on November 13, 2007:

State of New York
Office of the Attorney General
Attorneys for Defendants
Jose Velez, Esq. Assistant Attorney General
120 Broadway
New York, N.Y. 10271-0332

